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11 **Pro Hac Application Pending*
12 Attorneys for Plaintiff

13 **UNITED STATES DISTRICT COURT**

14 **DISTRICT OF NEVADA**

15 TASER INTERNATIONAL, INC., a Delaware
16 corporation,

17 Plaintiff,

18 vs.
19 STINGER SYSTEMS, INC., a Nevada
20 corporation; JAMES F. MCNULTY, Jr., a
21 Nevada resident; and ROBERT GRUDER, a
22 Florida resident,

Defendants.

Case No. 2:09-CV-00289-KJD-PAL

**REVISED MOTION TO AMEND
COMPLAINT**

(Securities Fraud under 15 U.S.C. § 78j;
Trade Libel; Unfair Competition under
the Lanham Act, 15 U.S.C. § 1125;
Abuse of Process; Injunctive Relief)

(Jury Trial Demanded)

1 Pursuant to Rule 15(a)(1), Fed. R. Civ. P., Plaintiff respectfully requests the Court
2 grant leave to file its Second Amended Complaint. The proposed Second Amended
3 Complaint is attached as Exhibit 1.

4 Plaintiff is working with its retained expert and diligently attempting to comply with
5 the deadlines set forth in the Court's Scheduling Order. The changes proposed in the Second
6 Amended Complaint do not substantially alter the original Complaint or First Amended
7 Complaint. No parties are added. The relief sought is further clarified, and Plaintiff adds
8 one additional claim for relief, civil conspiracy.
9

10 For these reasons, because this motion is timely under the Court's Order, and because
11 amendment of the Complaint will create no undue prejudice to Defendants and will promote
12 judicial economy, Plaintiff respectfully requests that the Court grant leave to file the Second
13 Amended Complaint attached as Exhibit 1 hereto.
14

Respectfully submitted this 27th day of May, 2010.

15 **ALBRIGHT STODDARD WARNICK & ALBRIGHT**

16 By: /s/ Mark A. Fuller

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Attorneys for Plaintiff

1 ***ORIGINAL of the foregoing e-filed this***
2 ***27th day of May, 2010 with:***

3 Clerk of the Court
4 UNITED STATES DISTRICT COURT, DISTRICT OF NEVADA
5 333 South Las Vegas Blvd.
6 Las Vegas, NV 89101

7 ***COPY of the foregoing mailed this***
8 ***27th day of May, 2010 to:***

9 P. Sterling Kerr
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12 Henderson, NV 89014
13 *Attorney for Stinger Systems, Inc. and Robert Gruder*

14 James McNulty
15 10620 Southern Highlands Parkway, Suite 110
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17 *Pro Per*

18 By: /s/ Kim Haggard
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